

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of:

Request for Review and Waiver	)	
of the Decision of the	)	
Universal Service Administrator by	)	
	)	
Integrity Networking Solutions	)	
SPIN Number: 143008507	)	CC Docket No: 02-6
	)	
On Behalf of:	)	
Santa Fe Indian School	)	
BEN Number: 99297	)	
	)	File No. SLD- 434315
Schools and Libraries Universal Service	)	
Support Mechanism	)	
	)	
Wireline Competition Bureau	)	

**REQUEST FOR REVIEW AND WAIVER**

**INTRODUCTION**

Section 54.719(c) of the Commission's rules provides that any person aggrieved by an action taken by a division of the Universal Service Administrative Company may seek review from the Commission.<sup>1</sup> Integrity Networking Solutions (Integrity) on behalf of Santa Fe Indian School (SFIS) hereby appeals the current action taken by USAC in the following case.

**BACKGROUND**

On January 11, 2005, the SLD approved 2004 Funding Year commitments for the following SFIS funding requests, FRN 1209836, FRN 1209837, and FRN 1209838. All

---

<sup>1</sup> 47 C.F.R. § 54.719(c).

three of these funding commitments involved internal connections requests with Integrity Networking Solutions as the chosen service provider. SFIS should have filed their Form 486 with the SLD by May 11<sup>th</sup>, 2005, which was 120 days after the date of the FCDL. However, SFIS sent in the Form 486 on June 13, 2005. The SLD should have adjusted the service start date on all three of the FRNs to February 13, 2005, which is 120 days prior to the postmark date on the Form 486. However, when SFIS submitted their Form 486, the School used a service start date of July 1, 2005, instead of July 1, 2004. The use of July 1, 2005, as the start date was a clerical error on behalf of the School.

Once Integrity knew the SFIS had filed their Form 486, Integrity shipped the funded, eligible products. Integrity then invoiced SFIS and the SLD for all three of the FRNs at issue on June 24, 2005. Copies of the original invoices are attached as Exhibit A. As all three invoices show, Integrity delivered and invoiced SFIS and the SLD at what would have been the proper time, but for the clerical error made on the Form 486. When the SLD the Integrity invoices, they made partial payments, but have not paid the invoices in full. Integrity has filed invoice extension requests with the SLD which were denied. A copy of the invoice extension denial is attached as Exhibit B.

## **DISCUSSION**

When Integrity originally submitted their invoices for payment back in June of 2005, the invoices were only partially paid due to fact the service start date on the Form 486 had been given as July 1, 2005. Both SFIS and Integrity have attempted to correct the problem at the SLD.<sup>2</sup>

There was not intent on the part of SFIS or Integrity to create any kind of waste, fraud or abuse to the program. Instead this is a payment issue. The funded services were delivered within the proper timeframe, by the proper service provider and at the proper locations.

---

<sup>2</sup> Please see email correspondence from William Kingston at Integrity to Paul Stankus, SLD Ombudsman which is attached as Exhibit C.

**SUMMARY**

At this time, Integrity and SFIS request the FCC ask USAC to treat the service start date for the FRNs at issue as if it were February 13, 2005, and to grant Integrity an invoice extension so their invoices can be processed and paid in full by the SLD.

A handwritten signature in black ink, appearing to read "Glenn Perkal". The signature is fluid and cursive, with the first name "Glenn" written in a more compact, stylized manner and the last name "Perkal" written more fully.

Respectfully,

Glenn Perkal, Vice-President  
Integrity Networking Systems, Inc.  
On Behalf of Santa Fe Indian Schools  
(505) 563-4903  
[gperkal@integrityns.com](mailto:gperkal@integrityns.com)

## Exhibit A

\*\*\*\*\* INVOICE \*\*\*\*\*

PAGE: 1

Integrity Networking Systems, Inc.  
4601 Columbine Avenue NE  
Albuquerque, NM 87113-2288  
#85-0402866

(505) 294-7747

INVOICE NUMBER: 0070842AA-IN  
INVOICE DATE: 06/24/05

ORDER NUMBER: 0070842  
ORDER DATE: 06/08/05  
SALESPERSON: EW

SOLD TO: SAN0003  
Santa Fe Indian School, Inc.  
Administrative Services  
P.O. Box 5340

Santa Fe

NM 87502

SHIP TO:  
Santa Fe Indian School  
Ref: 20051155  
Attn: Aruther Eberial  
1501 Cerrillos Rd  
Santa Fe NM 87505

SHIP DATE: 06/15/05

CUSTOMER P.O.		SHIP VIA	F.O.B	TERMS		
20051155		GROUND	DEST	Net 30 Days		
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
CON-SNT-C6509	EACH	4.00	.00	4.00	5,909.09	23,636.36
CISCO SMARTNET FOR 6509						
CON-SNT-WS-C450	EACH	1.00	.00	1.00	1,600.00	1,600.00
6, CISCO SMART NET MAINT FOR 4506						
CON-SNT-C3550E	EACH	4.00	.00	4.00	399.00	1,596.00
MI, CISCO SMARTNET MAINT FOR 3550						
CON-SNT-WS-C6	EACH	2.00	.00	2.00	9,999.00	19,998.00
513, CISCO SMARTNET 8XSXNBD C6513-CHASSIS						

NET ORDER: 46,830.36  
LESS DISCOUNT: .00  
FREIGHT: .00  
SALES TAX: 3,161.05  
ORDER TOTAL: 49,991.41

FRN 12009837

90% SLD AMOUNT REQUESTED: 44,992.27

70842AA INDIAN SCHOOL INVOICE AMOUNT DUE: 4,999.14

1209837

49,991.41

44,992.27

4,999.14

# 17,552.41 SLD 17

6/25

## \*\*\*\*\* INVOICE \*\*\*\*\*

PAGE: 1

Integrity Networking Systems, Inc.  
4601 Columbine Avenue NE  
Albuquerque, NM 87113-2288  
#85-0402866

(505) 294-7747

SOLD TO:  
Santa Fe Indian School, Inc.  
Administrative Services  
P.O. Box 5340  
Santa Fe NM 87502  
CONFIRM TO:

INVOICE NUMBER: 0070842A-IN  
INVOICE DATE: 06/24/05

ORDER NUMBER: 0070842  
ORDER DATE: 06/08/05  
SALESPERSON: EW

SHIP TO:  
Santa Fe Indian School  
Ref: 20051155  
Attn: Aruther Eberial  
Santa Fe NM 87505

SHIP DATE: 06/15/05

CUSTOMER P.O.	SHIP VIA	F.O.B	TERMS			
20051155	GROUND	DEST	Net 30 Days			
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
CON-SNT-MCS- 7835, CISCO SMARTNET MAINT	EACH	2.00	2.00	2.00	1,645.45	3,290.90
CON-SAU-CCM- 3335, CISCO SW APP SUPP +UPGR	EACH	2.00	2.00	2.00	1,453.63	2,907.26

NET ORDER: 6,198.16  
LESS DISCOUNT: .00  
FREIGHT: .00  
SALES TAX: 418.38

ORDER TOTAL: 6,616.54

FRN 1209836  
90% SLD AMOUNT REQUESTED: 5,954.89  
SANTA FE INDIAN SCHOOL INVOICE AMOUNT DUE: 661.65

## \*\*\*\*\* INVOICE \*\*\*\*\*

PAGE: 1

Integrity Networking Systems, Inc.  
4601 Columbine Avenue NE  
Albuquerque, NM 87113-2288  
#85-0402866

(505) 294-7747

INVOICE NUMBER: 0070842BA-IN  
INVOICE DATE: 06/24/05

ORDER NUMBER: 0070842  
ORDER DATE: 06/08/05  
SALESPERSON: EW

SOLD TO: SAN0003  
Santa Fe Indian School, Inc.  
Administrative Services  
P.O. Box 5340

Santa Fe

NM 87502

SHIP TO:  
Santa Fe Indian School  
Ref: 20051155  
Attn: Aruther Eberial  
1501 Cerrillos Rd  
Santa Fe NM 87505

SHIP DATE: 06/15/05

CUSTOMER P.O.	SHIP VIA	F.O.B	TERMS			
20051155	GROUND	DEST	Net 30 Days			
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
*M1-80000044000	EACH	88.00	88.00	.00	31.36	2,759.68
VBRICK ONE YEAR SW MAINT						
S/N M2100004462, M210004463, M210004464,						
M210004465, M2100004466, M210004467, M210004468						
M210004469, M210004470, M210004471, M210004472						
M210004473, M210004474, M210004475, M210004476						
M210004477, M210004478, M210004479, M210004480						
M210004481, M210004482, M210004483, M210004484						
M210004485, M210004486, M210004487, M210004488						
M210004489, M210004490, M210004491, M210004492						
M210004493, M210004494, M210004495, M210004496						
M210004497, M210004498, M210004499, M210004500						
M210004501, M210004502, M210004503, M210004504						
M210004505, M210004506, M210004507, M210004508						
M210004509, M210004510, M210004511, M210004512						
M210004513, M210004514, M210004515, M210004516						
M210004517, M210004518, M210004519, M210004520						
M210004521, M210004522, M210004523, M210004524						
M210004525, M210004526, M210004527, M210004528						
M210004529, M210004530, M210004531, M210004532						
M210004533, M210004534, M210004535, M210004536						
M210004537, M210004538, M210004539, M210004539						
M210004540, M210004541, M210004542, M210004543						
M210004544, M210004545, M210004546, M210004547						
M210004548, M210004549,						

CONTINUED

## \*\*\*\*\* INVOICE \*\*\*\*\*

PAGE: 2

Integrity Networking Systems, Inc.  
4601 Columbine Avenue NE  
Albuquerque, NM 87113-2288  
#85-0402866  
(505) 294-7747

INVOICE NUMBER: 0070842BA-IN  
INVOICE DATE: 06/24/05  
ORDER NUMBER: 0070842  
ORDER DATE: 06/08/05  
SALESPERSON: EW

SOLD TO: SAN0003  
Santa Fe Indian School, Inc.  
Administrative Services  
P.O. BOX 5340  
Santa Fe NM 87502

SHIP TO:  
Santa Fe Indian School  
Ref: 20051155  
Attn: Aruther Eberial  
1501 Cerrillos Rd  
Santa Fe NM 87505

SHIP DATE: 06/15/05

CUSTOMER P.O.	SHIP VIA	F.O.B	TERMS			
20051155	GROUND	DEST	Net 30	Days		
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT

\*M1-80000044000 EACH 5.00 5.00 .00 460.69 2,303.45  
VBRICK ONE YEAR SW MAINT

S/N M210004457, M210004458, M210004459  
M210004460, M210004461

\*M1-80000044000 EACH 7.00 7.00 .00 418.98 2,932.86  
VBRICK ONE YEAR SW MAINT

S/N M210004450, M210004451, M210004452,  
M210004453, M210004454, M210004455, M210004456

TRACKING #'s  
006475

NET INVOICE: 7,995.99  
FREIGHT: .00  
SALES TAX: 539.73  
INVOICE TOTAL: 8,535.72

FRN 1209838  
90% SLD AMOUNT REQUESTED: 7,682.15  
SANTA FE INDIAN SCHOOL INVOICE AMOUNT DUE: 853.57

1509838  
7094 81  
8,535.72 - 7  
7,682.15 - 90%  
853.57 - 10%  
\$2,000.00  
\$2,000.00


**Schools & Libraries Division**


---

**Administrator's Decision on Invoice Deadline Extension Request**

July 13, 2007

Glen Perkal  
 Integrity Networking Systems, Inc.  
 4601 Columbine NE  
 Albuquerque, NM 87113

RE: Santa Fe Indian School

RE: SLD Invoice #:	N/A	BEAR or SPI:	SPI
		Invoice Date:	N/A

SLD Line(s) #:	N/A
Vendor invoice #:	N/A
471 Application Number:	434315
Funding Request Number(s):	1209836, 1209837, 1209838
Your Correspondence Dated:	May 8, 2007

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the invoice number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A	Line(s): N/A
Decision on Request:	<b>Denied</b>

Explanation: Current deadline guidelines and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:



If you wish to appeal a decision in this letter, your appeal must be received by the SLD or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the decision letter and the decision you are appealing:
  - appellant name,
  - applicant or service provider name,
  - BEN and/or SPIN,
  - Form 471 and FRN
  - invoice number as assigned by the SLD,
  - “Administrator’s Decision on Invoice Deadline Extension Request” dated 07/13/2007 **AND**
  - the exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by the SLD’s decision. If you are a service provider, please provide a copy of your appeal to the applicant affected by the SLD’s decision.
5. Provide an authorized signature on your letter of appeal.

To submit your appeal to the SLD by e-mail, use the “Submit a Question” feature on the web site at [www.usac.org/sl/](http://www.usac.org/sl/). Click “Continue,” choose “Appeals” from the Topics Inquiry on the lower portion of your screen, and click “Go” to begin your appeal submission. The system will prompt you through the process. The SLD will automatically reply to incoming e-mails to confirm receipt.

To submit your appeal to the SLD by fax, fax your appeal to (973) 599-6542.

To submit your appeal to the SLD on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division  
100 South Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our web site. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Arthur Eberiel, Santa Fe Indian School

**Bill Kingston**

12/13 Paul

To: pstankus@universalservice.org  
Subject: Outstanding Invoices

FY-7

Paul;

Thank you for speaking with me yesterday. Our Company has experienced numerous problems during the invoice and payment process for Schools and Libraries (i.e.; e-Rate). I would like to begin to work through these issues and I am open to any suggestions that makes this process as easy as possible for both our organizations.

This is a current example of the problems Integrity has experienced. Three invoices were submitted for Santa Fe Indian Schools (details Below). Integrity submitted invoices for product and services in June 2005. SLD approved partial payment. The partial payment was due to "Partial Payment, Inv> \$ Remaining due to 486 violation; 1207;" The School was informed of the reduction and the School indicated that this was a mistake on the part of SLD. The School said that they had asked if a Form 500 was required for this and was told no. The School advised to resubmit invoices for the unpaid amounts. These invoices were resubmitted in August 2005 for partial amounts that were not paid. These invoices were denied in total due to "Bill Dt prior to (486) Actual Start Date; 38; Discount amt. Billed not Valid; 48; Customer Billed Date before Service Start Date per 486; 229; Requested discount Amount not valid; 335;". I called SLD to ask a question and was told that the School had to submit a Form 500. The School submitted a Form 500 and was approved at the end of September. Invoices were resubmitted and were denied again due to "Billed date after (6/30/05) fund year; mnthly cost; 76; Customer Billed Date Outside Funding Year; 285;". I, again, emailed and called SLD to ask a question and was told that I, now, needed to request an invoicing extension. I have done so in October (SLD Inquiry #21-323349). I have not had a response on this request nor received further payment.

*FRN-1209836 Form 471 application Number-434315 Santa Fe Indian School Contact SPIN:143008507 SLD Invoice Number:583771 Amount of SLD Invoice: \$3,630.59 Reason for Extension: School's Form 500 was recently approved. This invoice was submitted prior to the Form 500.*

*FRN-1209837 Form 471 application Number-434315 Santa Fe Indian School Contact SPIN:143008507 SLD Invoice Number:583789 Amount of SLD Invoice: \$27,429.90 Reason for Extension: School's Form 500 was recently approved. This invoice was submitted prior to the Form 500.*

*FRN-1209838 Form 471 application Number-434315 Santa Fe Indian School Contact SPIN:143008507 SLD Invoice Number:583778 Amount of SLD Invoice: \$4,683.67 Reason for Extension: School's Form 500 was recently approved. This invoice was submitted prior to the Form 500.*

As you can see from this one invoicing effort that began in June 2005 is still unresolved. Additionally, you can see from the summary above the amount of man-hours it has taken on the part of the School, SLD, and Integrity just to get this far and this has nothing to do with the actual delivery of goods and services provided to the school.

Please, I am open to any suggestions for processing these specific invoices. Additionally, we have many other open invoices and would like advice on proceeding with those as well.

Thank you,

*Bill*

William J. Kingston  
Operations Manager  
Integrity Networking Systems, Inc.  
4601 Columbine NE  
Albuquerque, NM 87113  
505 294-7747  
505 275-1125 Fax  
[bkingston@integrityNS.com](mailto:bkingston@integrityNS.com)